

HUNTON ANDREWS KURTH LLP 200 PARK AVENUE NEW YORK, NY 10166-0005

TEL 212 · 309 · 1000 FAX 212 · 309 · 1100

ARMIN GHIAM

DIRECT DIAL: 212 • 908 • 6207 EMAIL: aghiam@HuntonAK.com

FILE NO: 119686,0000182

June 24, 2022

Via ECF

The Honorable Judge John G. Koeltl United States District Court Southern District of New York 500 Pearl Street, Room 1330 New York, NY 10007

Re: NSI International, Inc. v. Horizon Group USA, Inc.,

Case No. 1:20-cy-8389 (S.D.N.Y.) (JGK)

Dear Judge Koeltl:

We represent Defendant Horizon Group USA, Inc. ("Horizon") in the above-referenced matter. Pursuant to the Court's Electronic Case Filing Rules & Instructions § 6 and Your Honor's Individual Practices for filing redacted materials, Horizon respectfully seeks leave to redact from its Answer and Counterclaims certain paragraphs referencing confidential information of Plaintiff NSI International, Inc. ("Plaintiff") and Horizon (the "Confidential Materials"). Horizon's Answer and Counterclaims is being filed simultaneously.

The Confidential Materials consist of various terms of a confidential agreement between Plaintiff and Horizon. The parties designated the agreement and its terms confidential, and Horizon's claim for breach of contract references these terms. For these reasons, we respectfully ask that the Court grant Horizon's request for leave to redact the references to the Confidential Materials in its Answer and Counterclaims.

We thank you in advance for your time and consideration.

Sincerely,

/s/ Armin Ghiam

cc: All Counsel of Record

APPLICATION GRANTED
SO ORDERED

John G. Koeltl, U.S.D.J